

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SKYLINE SOFTWARE SYSTEMS, INC.,

Plaintiff,

v.

KEYHOLE, INC., and
GOOGLE INC.,

Defendants.

CIVIL ACTION NO. 04-11129 DPW

**DECLARATION OF MICHAEL T. JONES IN SUPPORT OF DEFENDANTS' MOTION
TO IMPOUND MEMORANDUM OF POINTS AND AUTHORITIES, DECLARATION
OF MICHAEL T. JONES AND DECLARATION OF STEVEN FEINER IN
OPPOSITION TO PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

REQUEST FOR SPECIAL ACTION – Local Rule 5.1(c)

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I, Michael T. Jones, declare and state as follows:

1. I am currently Chief Technology Officer of Google Earth, a product of Google, Inc. Prior to holding this position, I was Chief Technology Officer of Keyhole, Inc., during which time I was responsible, along with others, for developing a software product called Keyhole, a technology capable of delivering satellite and 3D images of the Earth over the Internet. In my capacity as Chief Technology Officer of Keyhole, I was responsible for managing Keyhole's research and development. In my current role as Chief Technology Officer, I continue to be responsible for the Keyhole product, which is now offered in several variations, including a product called Google Earth. I submit this declaration in support of Defendants' Motion to Impound Memorandum of Points and Authorities, Declaration of Michael T. Jones and Declaration of Steven Feiner in Opposition to Plaintiff's Motion for Preliminary Injunction. I have personal knowledge of the following facts and could competently testify as to their truth.

2. Defendants' Google Earth products facilitate delivery of satellite and 3D images of the Earth to users via the Internet. The internal operation of Defendants' Google Earth products is Defendants' confidential and trade secret information. Defendants wish to protect this information from disclosure to its competitors and to the general public.

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 31st day of January 2006 at Mountain View, California.

/s/ Michael T. Jones

MICHAEL T. JONES

Certificate of Service

I hereby certify that, on January 31, 2006, I caused a true and accurate copy of the foregoing document to be served upon all counsel of record for each party by complying with this Court's Administrative Procedures for Electronic Case Filing.

By: /s/ Darryl M. Woo

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